EXHIBIT 7

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

Track One B Cases

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

AFFIDAVIT OF DEREK JONES

I, the undersigned Derek Jones, hereby swear under penalty of perjury:

1. This affidavit is based upon my personal knowledge. I am over the age of 18 and am competent to make this affidavit.

2. I am the Senior Director of Health & Wellness Technology at Walmart Inc. ("Walmart"). In that role, I manage the teams and individuals who are responsible for, among other things, maintaining the technology that contains electronic records of medications dispensed at Walmart pharmacies ("Dispensing Data").

3. I understand the Court entered an Order on December 10, 2019 ("Order") directing that "Pharmacy Defendants shall produce transaction dispensing data for the entire United States from 1996 forward."

Walmart Pharmacies and Dispensing Data

4. Walmart and/or its subsidiaries currently operate over 4,650 Walmart pharmacies in the United States, over 140 Walmart pharmacies in Ohio, and 11 Walmart pharmacies in Summit County and Cuyahoga County, Ohio.

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5. Each prescription filled by a Walmart pharmacy corresponds to one or more unique rows of Dispensing Data when extracted from Walmart's systems.

6. The amount of Dispensing Data generated by each Walmart pharmacy varies based on the pharmacy's size, location, and time period. A single Walmart pharmacy will generate Dispensing Data for approximately 1,300 to 2,000 medication fill transactions per week by current average. Using these estimates, Walmart pharmacies nationwide will generate approximately 310 million to 480 million unique rows of Dispensing Data each year.

Data Production Burden

7. To the best of my knowledge, Walmart has never previously attempted to query, extract, and produce Dispensing Data on the scale contemplated by the Order. For that reason, it is difficult for Walmart to ascertain the technological and personnel resources necessary to comply with the Order. Similarly, it is difficult for Walmart to estimate the amount of time such compliance would require.

8. The systems that maintain Dispensing Data are continuously used in the operation of Walmart pharmacies. I am concerned that performing the steps necessary to query, extract, and produce Dispensing Data in compliance with the Order would adversely affect the operation of those systems in a way that disrupts business operations.

9. I can more reliably estimate the time necessary for Walmart to produce Dispensing Data on a scale that is smaller than what is contemplated by the Order. For example, I estimate it will take approximately 6 weeks for Walmart to perform the work necessary to query, extract, and produce available Dispensing Data for the Walmart pharmacies operating in Summit County and Cuyahoga County, Ohio for a 3-year time period with the approximately 20 data points I

understand plaintiffs have requested.   This amount of time would increase if additional data points, pharmacies, or time periods were required to be added.

10. At this time, my best estimate for the time necessary for Walmart to query, extract, and produce available Dispensing Data on a nationwide basis for all Walmart pharmacies for the 1996 to present time period would be approximately 4 to 8 months. Because Walmart has not, to my knowledge, previously attempted to query, extract, and produce Dispensing Data on the scale contemplated by the Order, it is difficult to predict what unforeseen issues Walmart would encounter if it were to attempt such an endeavor.

HIPAA

11. Walmart's Dispensing Data contains highly-sensitive protected health information that is subject to the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and state privacy laws. Walmart takes the privacy of its customers' protected health information seriously. Walmart has invested in technological and personnel resources to maintain the security of such protected health information.

12. Consistent with the purposes of HIPAA and state privacy laws, and to protect its customers' protected health information, Walmart will need to run a hashing algorithm to de-identify protected health information before producing any Dispensing Data.

13. The amount of time it will take to de-identify protected health information in Dispensing Data will depend upon the size of the dataset—the larger the dataset, the longer it will take to de-identify the protected health information.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on December 20, 2019 in Bentonville, Arkansas.

Derek Jones

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Derek Jones

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